DIMP

(Distribution Integrity Management Program)

Report on Phase 1 Investigation - One Perspective -

Gas Distribution Systems

- → Lower Pressure (Usually < 250 psig)</p>
- → More Complex (~2 Million Miles)
- → Don't Rupture
- → Fail as Leaks (for Various Reasons)
 - ◆Can Be High Mass Flow (see PST EFV Report)
 - →Rate Important What Type & Where
 - → Leak Tracking Very Important
 - → All Systems Leak
- → Most Pipeline Deaths in U.S. (more miles)
- → Usually Intrastate System

DIMP

- → Not Transmission IM
- → DIMP Appropriate & Should Apply to <u>All</u> Gas Distribution Operators (i.e. master meters)
- → Operator Must Know Their System
 - → The 7 Key Elements
- → Recommends System Wide Performance Based Regulation
 - → High Level Flexible
 - → Small vs Large Operator
 - +Simple Detail Guidance for Small Operator

DIMP Report Key Issues

- +3rd Party Damage Enforcement
- +Managing and Reporting Leaks
- **→**EFVs

3rd Party Damage Enforcement

- → 3rd Party Damage Leading Cause of Gas Distribution Failure
- → Education Important But Limited in its Effectiveness
- Many Violators Not Subject to Pipeline Safety Regulations
 - → Limits of One-Call/Those Who Will Not Call!
 - → High Percentage of One-Call Results in Damage
- The Few States With Damage Enforcement (9 elements) Have Reduced Damages
 - → Funding for States Critical

Managing Gas Leaks

- +All Gas Systems Leak
 - → Measurement/Classification/Tracking
 - **→**Some Intermittent
- +Key Issues
 - →Subjective & Inconsistency
 - →Current Annual Report Inadequate
 - →Who Gets to See Reports?
- Leak Reporting The Critical Issue!
 - →Flag Possible System Breakdowns?

EFVs

- → For New & Replacement Service Lines
- → Not Appropriate in All Service Lines
- → Operation of 6.3 million EFVs in U.S. Demonstrates Highest Reliability
- → A Safety Against Combination of Risk Factors
 - → 3P's Place Operator at Highest Risks & Most Likely Candidate for EFVs
- → Provide Guidance on Where EFVs Not Appropriate

Where Going From Here?

- → Much Good Accomplished in Past Year
- → Now In PHMSA Hands
- → Performance Metrics
- → Low-Stress Transmission Pipelines?
- → 2008 2009 Time Frame!
- → Could Be Big Difference Between Report and Final Regulation